

PD-0788-20

ENRIQUE ANGEL RAMOS,
Appellee

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IN THE COURT OF
COURT OF CRIMINAL APPEALS
11/5/2021
DEANA WILLIAMSON, CLERK

STATE OF TEXAS, Appellant

STATE OF TEXAS

**APPELLEE'S MOTION FOR EXTENSION OF TIME TO FILE
MOTION FOR REHEARING**

MAY IT PLEASE THE COURT:

COMES NOW Enrique Angel Ramos, Appellee in the above cause and pursuant to TRAP Rules 79.1, files this motion for extension of time to file a motion for rehearing and would show this Court the following:

The opinion by this Court was issued on October 20, 2021.

The due date to file a motion for rehearing is November 4, 2021.

This is Appellee's first motion for extension of time to file his motion for rehearing.

The Undersigned has not been able to timely complete this motion for rehearing for the following reasons:

1. On October 21, 2021, the Undersigned was set for:

- a. a criminal competency hearing in cause numbers CR-0547-21-B;
CR-1454-21-B;
- b. a permanency hearing in CW-0237-18-J;
- c. an arraignment hearing in CR-21-03793-I; CR-21-03794-I;

- d. a bond reduction hearing in CR-21-03793-I; CR-21-03794-I.
2. On October 25, 2021, the Undersigned was set for:
- a. pre-trial hearing in CR-2783-20-E.
3. On October 26, 2021, the Undersigned was set for:
- a. a pre-trial hearing in cause numbers: CR-18-07418-A; CR-18-07419-A; CR-18-07420-A; CR-18-07421-A; CR-18-07422-18-A; CR-18-07423-A.
 - b. trial in cause number CW-0052-20-J.
 - c. had a telephonic meeting with an inmate client.
4. On October 27, 2021, the Undersigned was set for:
- a. arraignment in CR-1944-21-A and CR-1681-21-A.
 - b. plea in cause numbers CR-0970-21-H and CR-2744-21-H.
5. On October 28, 2021, the Undersigned had a telephonic meeting with an out-of-town incarcerated client in a federal case.
6. On November 1, 2021, the Undersigned was set for:
- a. a special hearing in cause number CW-0201-20-J.
 - b. pre-trial in cause number CR-0335-21-E.
 - c. video conference with a client to admonish her on plea paperwork.
7. On November 2, 2021, the Undersigned was set for:
- a. a permanency hearing in CW-0086-21-J.

b. a permanency hearing in CW-0071-21-I.

c. was involved in a telephonic 2.5 hour unemployment benefits hearing.

8. On November 3, 2021, the Undersigned was set for:

a. arraignment in cause numbers CR-20-11501-F and CR-21-06311-F.

b. permanency hearing in CW-0085-21-J.

c. A docket control conference in F-2877-17-I.

9. On November 4, 2021, the Undersigned was set for:

a. special hearing in cause number CW-0143-13-J.

b. pre-trial hearing in cause numbers CR-2610-21-G; CR-1176-17-G; CR-1725-17-G.

c. competency hearing in CR-0547-21-B; CR-1454-21-B.

In addition to the foregoing, the Undersigned attends to many clients who are accused of crimes who are incarcerated in Willacy County, Zapata County, Hidalgo County, Jim Wells County, and Brooks County. She frequently travels to these locations to meet with her clients.

Request is therefore made to extend the deadline to file Appellee's motion for rehearing by 45-days. If granted, that would make his motion for rehearing due on December 20, 2021.

WHEREFORE, Appellee prays that this court grant his motion for extension of time to file his motion for rehearing by 45-days, which if granted, would make his motion for rehearing due on December 20, 2021.

Respectfully submitted,

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By: /s/ Victoria Guerra
Victoria Guerra
State Bar No. 08578900
Counsel for Appellant

CERTIFICATE OF COMPLIANCE

The undersigned certifies that according to the Microsoft Word word-count tool, this document contains 475 words.

/s/ Victoria Guerra
Victoria Guerra

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of November, 2021, the foregoing Appellee's motion for extension of time to file his motion for rehearing has been e-filed and electronically served on the following:

John R. Messinger
Assistant State Prosecuting Attorney
P.O. Box 13046
Austin, Texas 78711
information@spa.texas.gov

/s/ Victoria Guerra
Victoria Guerra

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

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Status as of 11/5/2021 9:34 AM CST

Case Contacts

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